

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CELLULAR COMMUNICATIONS
EQUIPMENT LLC,

Plaintiff,

V.

HMD GLOBAL OY,

Defendant.

[Decorative flourish]

Case No. 2:20-cv-00078-JRG

JURY TRIAL DEMANDED

SECOND SUPPLEMENTAL PROTECTIVE ORDER

WHEREAS, on August 14, 2020, the Court entered a Protective Order (the “Protective Order”) governing the disclosure of confidential materials in the above-referenced matter;

WHEREAS on September 9, 2020, the Court entered a Stipulated Protective Order Regarding Certain Non-Party Confidential Information (the “First Supplemental Protective Order”);

WHEREAS, non-party Apple Inc. (“Apple”) has requested and met and conferred with the parties regarding supplemental protections regarding the production of materials containing or constituting confidential information of Apple (“Apple Confidential Information”);

WHEREAS, Defendant HMD Global Oy has indicated that it does not oppose the supplemental protections requested by Apple, but Plaintiff Cellular Communications Equipment LLC (“Plaintiff”) does oppose Apple’s requests; and

WHEREAS, on October 2, 2020, Apple filed a Motion for Protective Order opposed by Plaintiff.

By reason of the foregoing, and for good cause shown, it is ORDERED that Apple Confidential Information produced by any party or non-party in this litigation shall be subject to the terms of the Protective Order, the First Supplemental Protective Order, and this Second Supplemental Protective Order:

1. Disclosure of Apple Confidential Information to Outside Experts or Consultants.
To the extent that a party seeks to disclose Apple Confidential Information to any outside expert or consultant pursuant to Section 5e of the Protective Order, the parties shall afford Apple the same notice, disclosure, and consent rights as provided to a producing party under the Protective Order; and
2. Exhibit List. The parties shall notify Apple should any Apple Confidential

Information appear on any party's trial exhibit list; and

3. Use of Apple Confidential Information at Hearing or at Trial. The parties shall use reasonable efforts to seal the courtroom and redact any related transcript should Apple Confidential Information be discussed at hearing or at trial, or, alternatively, provide Apple with reasonable notice before such use so that Apple may intervene.